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—
*NOT ADMITTED IN VA

February 19, 2009

Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, D.C. 20554

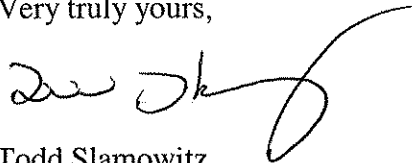
Re: EB Docket No. 06-36
Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2008
Vista License Holdings, L.L.C.

Dear Ms. Dortch:

On behalf of Vista License Holdings, L.L.C. and pursuant to Section 64.2009(e) of FCC rules, there is submitted herewith the carrier's 2008 CPNI certification with accompanying statement.

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,



Todd Slamowitz

Enclosure

cc: Best Copy and Printing, Inc.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed:

Name of company(s) covered by this certification: Vista License Holdings, L.L.C.

Form 499 Filer ID: 826522

Name of signing officer: James A. Dwyer, Jr.

Title of signatory: President & CEO

CERTIFICATION

I, James A. Dwyer, Jr., hereby certify that I am an officer of the Company(s) named above, and acting as an agent of the Company, that I have personal knowledge that the Company will establish operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.¹

Attached to this certification is an accompanying statement which explains how the Company's procedures will ensure that the company is in compliance with the requirements set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the Commission's rules. The Company did not take any actions against data brokers, and did not receive any consumer complaints, during the 2008 calendar year concerning the unauthorized release of CPNI.



Name: James A. Dwyer, Jr.

Title: President & CEO

Date: Febuary 18, 2009

¹ The Company(s) did not provide commercial service to subscribers during the calendar year 2008. It also does not currently provide commercial service to subscribers. As such, neither Section 222(c) of the Communications Act of 1934, as amended, nor the Commission's rules at 47 C.F.R. Part 64 Subpart U are presently applicable to the Company. Nonetheless, out of abundance of caution, it is hereby filing a CPNI certification to indicate that it will have CPNI procedures upon commencement of commercial service to subscribers.

Company Name(s) ("Carrier"): Vista License Holdings, L.L.C.

STATEMENT

Carrier will establish operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier will adopt a manual and keep it updated with FCC CPNI rule revisions, and will designate a CPNI compliance officer to oversee CPNI training and implementation.
- Carrier will continually educate and train its employees regarding the appropriate use of CPNI. Carrier will establish disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier will implement a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier will maintain a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier will also maintain a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI in such campaigns. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier will establish a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel will obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process that will ensure that opt-out elections are recorded and followed.
- Carrier will implement procedures to properly authenticate customers prior to disclosing CPNI in response to customer inquiries over the telephone, at Carrier's retail locations, electronically or otherwise. In connection with these procedures, Carrier will establish a system of personal identification numbers (PINs), passwords and back-up authentication methods for all customer and accounts, in compliance with the requirements of applicable Commission rules.
- Carrier will establish procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.
- Carrier will establish procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.